

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

CONTIQUE WILLCOT,

Plaintiff,

v.

SECURITIES AND EXCHANGE

COMMISSION, et al.

Defendants.

CASE NO. 7:24-cv-00317-DC-RCG

**CHRISTIANATTAR’S MOTION TO WITHDRAW AS ATTORNEYS OF RECORD FOR
DEFENDANT NEXT BRIDGE HYDROCARBONS, INC. AND SUBSTITUTE COUNSEL**

Pursuant to Local Rule AT-3, James W. Christian and Casidy R. Newcomer of the law firm ChristianAttar (collectively, “ChristianAttar”) file this Motion to Withdraw as Attorneys of Record for Defendant Next Bridge Hydrocarbons, Inc. and Substitute Counsel, and respectfully shows the following:

A. INTRODUCTION

1. Plaintiff is Contique Willcot; Defendants are Securities and Exchange Commission, Financial Industry Regulatory Authority, Depository Trust & Clearing Corporation, Next Bridge Hydrocarbons, Inc. (“NBH”), Greg McCabe, John Brda, GTS Securities, Charles Schwab & Co, Inc., Fidelity Investments, and American Stock Transfer & Trust Company/Equinti Group.

2. On December 30, 2024, Plaintiff filed his First Amended Complaint asserting various claims against NBH, including alleged violations of the Securities Exchange Act of 1934 (15 U.S.C. § 78), the Sherman Antitrust Act (15 U.S.C. §§ 1–2), and the Clayton Act (15 U.S.C. §§ 12–27), as well as claims for negligence, unjust enrichment, conspiracy to commit fraud, and emotional distress (both negligent and intentional infliction).

3. ChristianAttar was retained to represent NBH. On March 21, 2025, James W. Christian and Casidy R. Newcomer of ChristianAttar filed Motions to Appear Pro Hac Vice. (ECF 20 and 21). The Court granted the respective Motions to Appear Pro Hac Vice on March 25, 2025.

B. ARGUMENT

4. There is good cause for this Court to grant the motion to withdraw because there is a potential appearance of a conflict of interest. The potential conflict of interest arises from ChristianAttar's status as special counsel for the bankruptcy trustee in the matter captioned *In re Meta Materials Inc.*, Case No. 24-50792-hlb, pending in the United States Bankruptcy Court for Nevada ("Meta Action"). In the Meta Action, ChristianAttar is employed as special counsel for the Bankruptcy Trustee pursuant to 11 U.S.C. § 327(e). Under 11 U.S.C. § 327(e), special counsel cannot represent or hold any interest adverse to the debtor or to the estate with respect to the matter on which such attorney is to be employed.

5. To avoid any potential appearance of conflict under 11 U.S.C. §327, ChristianAttar seeks to withdraw from representation of NBH in this action. On April 23, 2025, the Bankruptcy Trustee in the Meta Action filed the First Amended Declaration of James W. Christian in Support of Application by Chapter 7 Trustee to Employ the Law Firm of ChristianAttar as Special Counsel (attached hereto as *Exhibit A*), which provides additional details concerning the circumstances surrounding the potential conflict of interest.

6. Judson Paul Manning of Field Manning Stone Aycock P.C. has agreed to be substituted as counsel of record for NBH. His Texas bar number is 24002521, and his office address, e-mail address, telephone number, and fax number are as follows:

Address: 2112 Indiana Avenue, Lubbock, Texas 79410
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5. Defendant NBH has consented to the withdrawal of ChristianAttar and the subsequent substitution of Judson Paul Manning of Field Manning Stone Aycock P.C. The requested withdrawal and substitution of counsel will not delay or otherwise prejudice these proceedings.

C. CONCLUSION

6. For the foregoing reasons, James W. Christian and Casidy R. Newcomer of ChristianAttar respectfully request that the Court grant their motion to withdraw as attorneys of record for Defendant Next Bridge Hydrocarbons, Inc., and approve the substitution of Judson Paul Manning of Field Manning Stone Aycock P.C. as counsel of record.

Date: May 2, 2025

Respectfully submitted,

/s/James W. Christian

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/s/J. Paul Manning

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**SUBSTITUTING ATTORNEY FOR
DEFENDANT NEXT BRIDGE
HYDROCARBONS, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2025, I electronically filed the forgoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/James W. Christian
James W. Christian

CERTIFICATE OF CONFERENCE

I hereby certify that on May 1, 2025, my senior associate, Casidy R. Newcomer, emailed Plaintiff Contique Willcot to inquire about his position on ChristianAttar seeking to withdraw from representation of Next Bridge Hydrocarbons, Inc., and a new attorney/firm being substituted into the case. As of the filing of this motion, Mr. Willcot has not responded.

/s/James W. Christian
James W. Christian